

# EXHIBIT B



September 13, 2023

VIA EMAIL

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Re: United States v. Edward Constantinescu, 4:22-CR-00612-S

Dear Counsel:

This letter is to follow up with the concerning issue we raised at last week's hearing. As you know, in September 2022, one of your testifying witnesses told Scott that he ran an Axiom tool across data you received from Twitter in response to search warrants. According to the email you first disclosed in a production in *August 2023*, the Axiom tool created some issue with the timestamps reflected in the Twitter data. There is no question that the timing of messages and posts has relevance in this case.

Accordingly, please immediately:

1. Disclose the precise issue that the Axiom tool created with the Twitter data and the timestamps.
2. Identify each piece of discovery (if any) that you produced that was generated by the Axiom tool.
3. Identify each item that any of your testifying witnesses relied upon that was generated by the Axiom tool.
4. Disclose whether Axiom was used to export or analyze data you received from Discord.
5. Identify any other records in the government's productions that was generated using the Axiom tool.

Given the obvious significance of this issue, we appreciate your prompt response.

Sincerely,

FORD O'BRIEN LANDY LLP

  
Jamie Hoxie Solano

cc: Matt A. Ford  
Stephen Halpin